

February 9, 2011

## **VIA ECFS**

Ms. Marlene Dortch Office of the Secretary Federal Communications Commission 445 12<sup>th</sup> Street, SW Suite TW-A325 Washington, DC 20554

Re:

EB Docket No. 06-36

SAVVIS Communications Corporation Certification of CPNI Filing

on February 9, 2011

Dear Ms. Dortch:

In response to the Public Notice issued by the Enforcement Bureau on January 28, 2011 (EB Docket No.: 06-36), SAVVIS Communications Corporation submits the attached certification.

Please direct any questions concerning this filing to the undersigned.

Very truly yours,

Morri Lammert

Paralegal

Tel: 314-628-7334 Fax: 314-628-7540

E-mail: morri.lammert@savvis.net

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Attachment

cc: Best Copy and Printing, Inc. (via e-mail)

## Annual 64.2009(e) CPNI Certification for 2011 Covering the Prior Calendar Year 2010

## EB Docket No. 06-36

Date filed: February 9, 2011

Name of company covered by this certification: SAVVIS Communications Corporation

Form 499 Filer ID: 823962

Name of Signatory: Dennis Brouwer

Title of Signatory: Vice President, Network Business Unit

I, Dennis Brouwer, certify that I am Vice President, Network Business Unit for SAVVIS Communications Corporation ("SAVVIS") and, acting as an agent of SAVVIS, have personal knowledge that SAVVIS has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules.

Attached to this certification is an accompanying "Statement of CPNI Compliance" explaining how SAVVIS's procedures ensure that SAVVIS is in compliance with the requirements set forth in section 64.2001, et seq., of the Commission's rules.

SAVVIS has not taken any actions against data brokers in the past year.

SAVVIS has not received any customer complaints in the past year concerning the unauthorized release of CPNI.

Dennis Brouwer

Vice President, Network Business Unit SAVVIS Communications Corporation

## STATEMENT OF CPNI COMPLIANCE

SAVVIS is a global leader in IT infrastructure services for business applications. SAVVIS serves only business and government customers.

SAVVIS has internal processes in place to ensure compliance with the Commission's CPNI Rules. SAVVIS's Code of Business Conduct and Ethics ("Code of Conduct") includes a comprehensive "Confidential Information" section detailing how employees are expected to treat any confidential information they are entrusted with in the course of their employment and beyond. Under these provisions, "confidential information" is defined broadly so that virtually all customer information is considered confidential, including any information that would be considered CPNI under section 222 of the Communications Act, as amended. See 47 U.S.C. §222(h)(1). All employees are required to sign, and are required to re-certify annually their understanding of and compliance with, the Code of Conduct, as a condition of employment. A copy of the Code of Conduct is accessible to employees on SAVVIS's internal intranet website, and at least once a year SAVVIS sends out an internal communication to all employees reminding them of their obligations under the Code of Conduct; that internal communication includes a link to the entire Code of Conduct.

All customer information is maintained in a password protected database that can be accessed only by authorized employees. As a general matter, authorized SAVVIS employees can access customer account information only to address customer questions or troubleshoot in cases in which a customer calls in to customer care, billing or the help desk to report issues or ask questions about its service. Customers are able to access their accounts on a secure Internet website using an assigned user name and password. SAVVIS does not use CPNI for marketing or any other purpose other than to provide the service to the customer, which also includes billing and collection for any telecommunications services provided.

If and when customers contact SAVVIS for information, they are required to provide their name to SAVVIS and SAVVIS then uses its secure database to verify that the name given is listed as an authorized contact for that customer. SAVVIS does not disclose customer information to anyone who is not an authorized contact. If the individual is not listed an authorized contact, SAVVIS requires the customer to provide a written authorization from the authorized contact or a company executive on that company's letterhead to change the company's authorized contact list. In addition, larger business customer and carrier customers are assigned a dedicated "Customer Account Manger" ("CAM"). CAMs manage between one and 12 customer accounts and are in frequent contact with these customers.

SAVVIS treats all customer information as confidential pursuant to the mutual confidentiality requirement in its contracts with its customers. SAVVIS requires prior written approval from customers for any such information to be disclosed to a third party, except to the extent the disclosure is required for the purpose of the agreement.